

U.S. AIR FORCE

FRAUD FACTS

EDITION FOCUS: COORDINATING REMEDIES

Although suspension and debarment are perhaps the more commonly known tools to protect the Government's interests when faced with contractor misconduct and fraud, they are not the only available tools. In fact, administrative remedies such as suspension and debarment are one of four pillars of procurement fraud remediation. The others are civil, criminal, and contractual. The remedies should proceed together in order to protect fully the Air Force's interests in response to contractor misconduct.

This issue of Fraud Facts discusses how these remedies work together, and the stakeholders involved in coordinating and effectuating the various remedies. Agents, investigators, fraud counsel, contract counsel, and the suspension and debarment program are all essential to the process, as are civil and criminal lawyers within the United States Department of Justice.

Among other things, this edition of Fraud Facts will:

- Profile an Air Force Office of Special Investigations agent and discuss her views on the timing of suspension and debarment decisions.
- Feature the Hanscom Air Force Base Procurement Fraud Working Group, and how it successfully brings a diverse group of stakeholders together to coordinate actions and eliminate a stove pipe mentality.
- Include an editorial from the Director of the Air Force Office of Procurement Fraud Remedies — charged with coordinating all four remedies — on the appropriate time for administrative remedies (i.e., suspension/debarment).

We also summarize recent debarment decisions and describe SAF/GCR outreach initiatives.

Enjoy!

Edition Focus: Coordinating Remedies	p. 1
Profile of AFOSI Agent Natalie Spaur	p. 2
Opinion: More than Mere Compliance	p. 4
Editorial: Early and Effective S/D Consideration	p. 5
Thoughts on Procurement Fraud Working Groups	p. 8

MAJCOM Perspective on Fraud Working Groups	p. 9
SAF/GCR Branches Out Into Social Media	p. 10
Selected Recent Debarment Actions	p. 10
Info Resource/Staff Update/Upcoming Events	p. 11



PROFILE OF SPECIAL AGENT NATALIE SPAUR

AIR FORCE OFFICE OF SPECIAL INVESTIGATIONS

9TH FINANCIAL INVESTIGATIONS SQUADRON

BY: ADAM MUNITZ AND DAVID ROBBINS

Special Agent Natalie Spaur of the Air Force Office of Special Investigations (AFOSI) is energetic and bubbly. She is also a no-nonsense fraud investigator. She has worked with SAF/GCR on a number of cases, and is always passionate about her work. We thought she would make an excellent candidate to profile in Fraud Facts. We conducted an extensive interview of SA Spaur for this profile and have inserted a few editorial comments in brackets throughout the profile. We hope that you enjoy getting to know her as we have.

SA Spaur has been with AFOSI for five years. Prior to joining AFOSI, she was a civilian police officer. SA Spaur knew from an early age that she wanted to be in law enforcement, and she joined AFOSI because it offered her the opportunity to do more interesting case work with a higher earning potential than her civilian police officer job. And her work has been fascinating. SA Spaur thoroughly enjoys the work she does with AFOSI, and it makes her feel like she is contributing to an honorable cause. Her only regret is that she has to describe AFOSI to civilians unfamiliar with her work as “the Air Force version of that NCIS television show” [but without the Hollywood spin].

Beginning each day in the fitness center is not only an enjoyable routine for SA Spaur, but also helps her meet the PT requirements for AFOSI. The remainder of her day is spent on case work. SA Spaur reports that fraud cases take a long time, and require substantial coordination among investigative agencies. Unlike her prior general crime investigations that usually could be resolved in a relatively short period, fraud investigations take longer and require a much higher level of mastery of details. At any given time, SA Spaur has five or six active fraud cases in various stages of development, and her day can be spent coordinating with other agents,



Special Agent Spaur won one of the Civilian Agent of the Year awards for 2007.

reviewing files, and advancing her investigations.

As for how she began working with SAF/GCR, after initially hearing about the suspension and debarment process in a Procurement Fraud Working Group meeting at Eglin AFB, SA Spaur sought out additional training from AFOSI and learned how valuable the suspension and debarment process could be to agents and investigators. [Procurement Fraud Working Group meetings occur quarterly at Eglin, and at many other bases throughout the Air Force community including Hanscom, as seen on page 1 of this edition of Fraud Facts, to provide training and an opportunity for the fraud fighting community to share best practices.] (cont'd)



PROFILE OF SPECIAL AGENT NATALIE SPAUR—CONTINUED

SA Spaur says that she recognizes that suspension and debarment exist for the protection of the Government's business interests, but that she realizes and appreciates the collateral benefits for investigative teams.

SA Spaur reported that she has generally referred cases to SAF/GCR for suspension or debarment consideration at the end of investigations. However, SA Spaur has involved SAF/GCR earlier in the process where, in light of blatant misconduct and the prospect of a lengthy and involved investigation, she and her team believe that the targets should not be in business with the Government while the investigation progresses. [The authors note that these referrals are always appreciated, but do not automatically lead to administrative action. The referral is evaluated at SAF/GCR the way any other referral would be and, if the facts lead to the conclusion that immediate action is necessary to protect the Government's interests, a suspension or proposed debarment will issue.]

In deciding whether or not to involve SAF/GCR, SA Spaur reports that the investigative team must consider the impact of sharing an administrative record with the subjects. Suspension and debarment cannot occur without an administrative record that can be provided to the respondents, and providing this information might reveal aspects of the investigation that investigators may wish to keep confidential. Accordingly, SA Spaur emphasized repeatedly that trust in the suspension and debarment team is the most vital aspect of successful referrals. "If we didn't trust you wholeheartedly, we would never refer any cases to you."

According to SA Spaur, collaborating with SAF/GCR has consistently helped with her investigations. During lengthy investigations, a suspension or debarment may be particularly helpful not only for the availability of administrative remedies, but because the SAF/GCR team members offer a fresh look at the material, and specialized legal knowledge and experience that may not otherwise be available to investigators. SA Spaur encourages other AFOSI

agents to form a healthy and trusting working relationship with SAF/GCR early on in the investigative process. She also recommends that AFOSI agents remain open-minded as they receive thoughts and ideas from SAF/GCR personnel, as the different perspective has proven valuable to SA Spaur. Lastly, SA Spaur advises her fellow agents against being overly cautious in sharing their case information with a SAF/GCR representative, because adding the additional perspective—even if it does not lead to administrative action—will help the investigation and, ultimately, the Department of Defense as a whole.

MORE THAN MERE COMPLIANCE: A CHINESE BUSINESS CONUNDRUM

BY: STEVEN A. SHAW, AIR FORCE SUS-
PENDING AND DEBARRING OFFICIAL

Progressive businesses have increasingly been focusing on their ethical business conduct, rather than solely on their compliance with laws. The Air Force fully supports this ethical focus and has been a leader in, and driving force behind, that movement within the defense industry.

This trend is important in the fight against procurement fraud, and we should continue to encourage it. There are at least three reasons why mere compliance with the law is not enough. First, what compass will employees use to guide their conduct when they don't know the law or are confused by it? Second, employees directed only to obey the law frequently conduct their business on the boundary of what is lawful, and not in the center of the field where doing the right thing is clear. Finally, progressive companies have found that they can frequently avoid fraud by encouraging their employees simply to do the right thing – broadly defined to include candor and transparency with the public and (cont'd)



MORE THAN MERE COMPLIANCE: A CHINESE BUSINESS CONUNDRUM

BY: STEVEN A. SHAW, AIR FORCE SUSPENDING AND DEBARRING OFFICIAL

their customers.

This trend toward promoting ethical business cultures manifests in many ways, including the creation of cultures willing to consider social responsibility factors as part of corporate decision-making. An interesting example of this trend favoring ethical business conduct, and a test for how sincere companies are in claiming that they behave ethically, is the way that businesses are tapping into the enormous new markets in China. With the possibility of huge profits on the horizon, businesses could be expected to compromise what they claim to be their high ethical business standards, using as a shield their mere compliance with minimal legal standards. That is exactly what we are seeing, and it's fascinating to watch. One industry described recently in the news makes the case most graphically.



Earlier this year Google decided that compliance with China's censorship laws and quiet tolerance of hacking efforts originating in China would not mesh with its own ethical standards. As Google was not willing to violate those laws, it saw pulling out of the market entirely as its only alternative, risking significant financial losses. Google took steps to do so by temporarily relocating servers to Hong Kong and removing other services. This bold move presumably incurred the additional risk of exposure to derivative actions that might be brought against Google by its shareholders challenging management's decision to leave profit on the table. Nevertheless, even faced with those risks, Google took the progressive approach – choosing to do the right thing, both ethically and within its social responsibility culture, even though what the company viewed as the “wrong thing” would have been financially rewarding and lawful. Although Google and China have since come to a compromise workable for both sides, one that included the renewal of Google's license to do business in China, the fact that Google weighed ethical and social responsibility considerations heavily — seemingly over profits and mere compliance with the law — is commendable.

The significance of Google's 21st Century decision making can best be seen by comparing it with that of at least one of its competitor's use of yesterday's business model (where corporate profit is the only consideration). When asked how Microsoft would respond to China's restrictive censorship laws, Bill Gates is reported to have said, “You've got to decide, do you want to obey the laws of the countries you're in, or not?” Gates, of course, misses the point. Legal compliance must be viewed as a baseline, with the target being ethical corporate conduct focused at a much higher level. Limiting business decisions to the binary question of whether to comply with laws leaves much to be desired. We must, and we do, expect more from our contractors. (cont'd)



MORE THAN MERE COMPLIANCE—CONT'D

This is not to say that Gates' focus on profit and compliance with laws are somehow poor objectives. They are not. Indeed, pursuit of profit is central to the well-being of corporations, and compliance with laws is the mandatory minimum of all corporate behavior. But the new standard of excellence is a culture where business leaders think through their decisions on three levels – potential profit, compliance with laws, and ethical and social consequences – not just on profit and compliance. Bill Gates apparently failed to even consider the third ethics prong of this analysis when asked how Microsoft would respond to Google's decision to pull out of China, as, in his view, compliance with China's laws was the only factor worth considering.

The Google/Microsoft story illustrates the impact of an organization's ethical culture. While the issues involved in the story have nothing to do with fraud, the corporate decision-making process of the two companies does make a statement regarding the impact of corporate culture on corporate conduct. We, as fraud-fighters, have a unique opportunity to limit procurement fraud before it happens by continuing to encourage and support our contractors' efforts to improve the ethical culture of their organizations.

- Steven Shaw

Notable Quote:

"Ethics is like an airplane. If you're not moving forward, you're falling."

SUSPENSION & DEBARMENT: EARLY & EFFECTIVE CONSIDERATION

By: Rodney A. Grandon,
Director of Procurement Fraud Remedies

Contractors suspended or debarred are excluded from receiving contracts, and agencies are prohibited from soliciting from, awarding contracts to, or consenting to subcontracts with suspended or debarred contractors. ***To take advantage of these administrative remedies, the Air Force must initiate suspension/debarment actions as early as possible once sufficient evidence exists establishing a cause for suspension or debarment.*** Failing to initiate suspension or debarment as soon as possible may result in the awarding of contracts and subcontracts to businesses lacking the integrity and capability required of a government contractor, thereby exposing the United States Government to further fraud, waste, and abuse. Moreover, as time passes, the delay in considering suspension or debarment has the potential to render evidence stale or the misconduct too distant to be able to make appropriate present responsibility findings to protect the government's business interests.

Agencies shall solicit offers from, award contracts to, and consent to subcontracts with responsible contractors only. Debarment and suspension are discretionary actions that, taken in accordance with this subpart, are appropriate means to effectuate this policy.

FAR 9.402(a).

The need for early suspension and debarment consideration is also captured in the Defense Federal Acquisition Regulation Supplement (DFARS), as the regulation directs stakeholders to "[r]efer all matters appropriate for consideration by an agency debarring and suspending official as soon as practicable" DFARS 209.406-3; 209.407-3. In the Procedures, Guidance and Information (PGI) section, the DFARS also provides detailed guidance on the content of a suspension or debarment referral.



SUSPENSION & DEBARMENT: EARLY AND EFFECTIVE CONSIDERATION (CONT'D)

debarment referral. *See* DFARS PGI 209.406-3. Notwithstanding the practical considerations noted above, or the DFARS direction, many stakeholders are unwilling to take steps to promote early suspension or debarment actions. It is useful to consider the concerns that have been raised by some within three groups of stakeholders: the acquisition community, the investigators, and the Department of Justice/ United States Attorney Offices (collectively referred to as the “DoJ attorneys”).

In matters involving contractor misconduct, or poor performance by a contractor, the three groups of stakeholders often have varying, and sometimes competing objectives and concerns. For example, the acquisition community seeks to acquire quality products and services as quickly as possible to support the warfighter. With a focus on getting products and services delivered as quickly as possible, the acquisition community prefers to avoid the perceived distraction associated with putting a suspension or debarment referral package together to submit to SAF/GCR (or getting involved in a fraud-related investigation). This concern is based, at least in part, on the detailed procedures set forth at PGI 209.406-3 for submitting suspension or debarment referrals to GCR.

Some investigators see DoJ attorneys as being their primary “customers,” and they focus their efforts on getting information to the DoJ attorneys to support a civil or criminal action, forgetting to provide the same, or similar, information to SAF/GCR. The investigators tend to maintain very tight controls over information to prevent the subject contractor from gaining any insight into the specifics of the investigation. Some investigators have expressed concern that sharing information with GCR may result in the contractor getting a de-

tailed look at the evidence that has been assembled through the investigation.

DoJ attorneys likewise are concerned about details of an ongoing investigation being communicated to the contractors as a result of the suspension and debarment process. DoJ attorneys also have expressed concern about the impact of parallel proceedings (*i.e.*, suspension or debarment proceedings) on their cases; they are concerned that a suspension or debarment proceeding could complicate their ability to convince a jury of the merits of the civil or criminal case. The result is that DoJ lawyers are hesitant to share information with, or to make documents available to GCR until after they have secured an indictment, a conviction, or a judgment – or declined to take on the case.

The stakeholders’ differing and sometimes competing objectives and concerns often result in a breakdown in communications among stakeholders, and matters not being referred to SAF/GCR for timely consideration of the contractor’s present responsibility. Fortunately, this challenge can be overcome if the government stakeholders are willing to work together as a team. The starting point for fostering such cooperation is for GCR to make sure that all stakeholders have an accurate understanding of the suspension and debarment process, especially the flexibility that is available in assembling the administrative record that supports each action. With such an understanding, many of the concerns and objections expressed by the stakeholders are resolved.

⇒ **Acquisition Community:** The acquisition community can swiftly move appropriate matters into GCR’s lane without taking away from the need to get quality products and services to the warfighter. It generally is unnecessary to submit the detailed referral contemplated by PGI



SUSPENSION & DEBARMENT: EARLY AND EFFECTIVE CONSIDERATION (CONT'D)

209.406. Rather, in many cases, a simple email to SAF/GCR identifying the contractor and the potential factual basis for suspension or debarment will be sufficient to allow GCR to begin working the matter. While GCR may require additional information from the acquisition community as the matter develops, we consciously try to avoid imposing additional work on an already over-burdened acquisition workforce.

⇒ **Investigators:** SAF/GCR recognizes the need to control the flow of information when an investigation is ongoing. We are willing to work closely with the investigators to identify sensitive information that cannot or should not be released to the contractor, and we can shape administrative records to support suspension or debarment without using sensitive information. In a suspension or debarment action, Respondents are entitled to receive only the same administrative record reviewed by the Suspending and Debarring Official, and GCR controls what documents are included in that record. *There is no discovery.* GCR understands there will be times when the investigators cannot make available information to support an action, but those times should be limited to protecting confidential sources and information, or avoiding the disclosure of information obtained through grand jury proceedings (*see* Federal Rule of Criminal Procedure 6(e)). We also have observed that in many cases the information gained through the suspension and debarment process – information that GCR routinely provides to the investigators for comment – advances the investigation. A contractor fac-

ing suspension or debarment has little choice but to be candid with the Suspending and Debarring Official, and to cooperate with government officials during the investigation and during any administrative or court proceedings, as these matters have a direct impact on the decision to suspend or to debar. *See* FAR 9.406-1.

⇒ **DoJ Attorneys:** The considerations discussed above also bear on concerns expressed by DOJ attorneys. GCR will work with DoJ attorneys to shape the record to protect areas where confidentiality or secrecy must be preserved. And, as noted above, because contractors have little choice but to be candid when facing a suspension or debarment, we often gain information during proceedings that is useful for the civil or criminal case – and we provide this information to DoJ for their comment and use. Additionally, as a practical matter (and to the extent admissible), a DoJ attorney should be in a better position with his or her trier of fact if the contractor has been suspended or debarred, as the suspension or debarment makes clear that the government regards the contractor's misconduct as serious. Conversely, in the absence of a suspension or debarment, the defense counsel may be able to make the opposite argument. Lastly, it is worthwhile to consider the position stated by the United States Court of Appeals for the Federal Circuit in *ATL, Inc. v. US*, 736 F.2d 677, 687 (Fed. Cir. 1984): “The [agency] must not allow a busy U.S. attorney to dictate the terms of a civil investigation. Instead, these agencies must work to ‘carve out’ as much evidence as (cont’d)





SUSPENSION AND DEBARMENT (CONT'D)

is reasonable for release to the contractor” to support suspension or debarment actions in a timely manner.

Bottom line: We all have a duty to protect the government’s interests.

When it comes to protecting the government from contractors with a record for engaging in fraud, waste, and abuse, we must work collectively to promote the flow of information so that timely action may be taken to prevent future awards to non-responsible contractors. We accomplish this through communication, cooperation, and a willingness to explore options that recognize the concerns of all stakeholders.

GCR looks forward to working with all of you.



PROCUREMENT FRAUD WORKING GROUPS: REALIZING THE OFFICE OF PROCUREMENT FRAUD REMEDIES’ VISION OF REGIONAL COORDINATION WITH GREAT EFFECT

⇒ **The Local Perspective, by John Crowley, Fraud and Program Counsel , ESC/JAA, Hanscom AFB**

The Boston Area Procurement Fraud Working Group (BAPFWG) is a quarterly forum for sharing best practices and training opportunities, and for building camaraderie among professionals in the government procurement community in the Boston area. The group, headed by the Electronic System Center’s (ESC) Fraud Counsel, Mr. John Crowley, has grown to include Program Managers and Contracting Officers, Agents from the Office of Special Investigation (OSI), as well as Air Force Fraud and Program Counsel. The group also includes representatives from other agencies such as the DCAA, DODIG, DCMA, the Department of Justice and the Army Criminal Investigations Division.

Each meeting involves an exchange of ideas, opinions, and techniques from members of the group. At the most recent meeting, representatives from the Headquarters Air Force Office of Procurement Fraud Remedies discussed the positive impact that administrative remedies, such as suspension and debarment, can have when appropriately used.

According to Mr. Peter Camp, Program Counsel at ESC, “the early and aggressive involvement of the BAPFWG is critical in successfully pursuing criminal and administrative remedies. Collectively, the group receives the benefit of several hundred years of relevant experience and is an outstanding tool to spot areas for improvement in an investigation; to develop new remedies approaches; or to trade trend-spotting information.”

The BAPFWG discusses and brainstorms the way forward in open OSI investigations to try and maximize efficiency and utilize the best available resources to contribute to case development. (Cont’d)



PROCUREMENT FRAUD WORKING GROUPS—LOCAL PERSPECTIVE, CONT'D

Thereafter, the Group collaborates in the application of the best appropriate remedies to the suspected fraud, whether contractual, criminal, civil and/or administrative in nature. This collegial approach from several disciplines and viewpoints, including lawyers, auditors, and contracting officials, strengthens the bonds and exploits the skill sets of the members. It also hones the ability of proponents to 'sell' appropriate cases to the Boston U S Attorney's office for civil or criminal action.

At a recent meeting, an OSI agent discussed a difficult case with the BAPFWG. The agent had exhausted most of her leads, but was convinced that the case had merit. By presenting to the group, the agent was able to get feedback and a fresh perspective from professionals who are engaged at every step of the procurement process. In the end, the members of the group offered a range of fresh possible solutions and the agent left the meeting with a new direction forward. While the group approach certainly benefited that particular case, the discussion also provided priceless interdisciplinary perspective for all members in attendance.

Whether meeting to discuss a particular topic or a broad general discussion of best practices, fraud working groups provide a great tool for those in the Government procurement community.



PROCUREMENT FRAUD WORKING GROUPS—MAJCOM PERSPECTIVE

⇒ **The MAJCOM-Level Perspective, by Brian Koza, Attorney, AFMCLO/JAF, WPAFB**

Approximately two years ago, the Acquisition Integrity Division (JAF) of the AFMC Law Office at Wright-Patterson AFB initiated a plan to stand up and support Installation Procurement Fraud Working Groups at each of the major AFMC buying and logistics centers. Since then, successful Groups, like the Boston Area/Hanscom PFWG discussed in this issue of Fraud Facts, have been established at Tinker AFB, Eglin AFB, Hill AFB, Robins AFB and Wright-Patterson AFB. A JAF attorney is assigned to each Group, makes visits to attend quarterly meetings of the Group and assists with education, information sharing, case analysis and development, and training for Group members and for the installation acquisition community. This sustained effort has resulted in AFMC centers having a better appreciation and capability for detecting and deterring acquisition fraud for their systems and programs, and in obtaining far more fraud-based remedies than before.



SAF/GCR BRANCHES OUT INTO SOCIAL MEDIA

Heeding the President's call for open and transparent government, in addition to maintaining a web presence, effective June 1, 2010, SAF/GCR branched out into social media and stepped up its efforts to keep the public informed about its actions.

Facebook

SAF/GCR's Facebook page may be found by searching "Air Force Debarment" either on Facebook, or on Google. Not only does the Facebook page contain links to, and instructions for, the relevant regulations, but it also will announce upcoming training and other events that may be of interest to the Government community or to the public.

Twitter

SAF/GCR's Twitter feed is found at @AFdebarmentHQ. Twitter will be used to announce training, events, publications and other items of interest, and the feed will be cross-published on Facebook as well.

Web

And, as always, SAF/GCR maintains its web presence at:

<http://www.safgc.hq.af.mil/organizations/gcr/index.asp>

We urge all fraud counsel to bookmark these pages and subscribe to these feeds so we can keep you informed of upcoming events. And please let us know if you have similar pages/feeds as well.



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SELECTED RECENT DEBARMENT ACTIONS

Zerene Aerospace Industries, et al.: Since we published the last Fraud Facts, the Air Force learned of an ever-widening conspiracy to illegally manufacture and sell to Government subcontractors non-conforming aircraft parts made of incorrect materials, manufactured in non-certified facilities, and laundered with false certificates claiming that Boeing manufactured the parts. Over the past few months, the Air Force has administered a rolling series of debarments that remove these contractors from the Government marketplace as soon as we learned about their content.

Zebra Engineering Controls, et al.: On a smaller, but no less important, scale than Zerene, the Air Force debarred several contractors for patterns of poor performance and false ORCA certifications. The same person owned several companies and received multiple set-aside contracts. However, none of the companies could effectively perform the contracts and the contracts were terminated for default. Rather than deal with the past performance issues caused by these failures and default terminations, the owner continued to set up new companies, and (incorrectly) certified each time that the contractor had never had a contract terminated for default or performance problems.

Helimed: Helimed and its owner were debarred for conspiring to inflate termination costs associated with a contract to lease helicopters in Afghanistan.



HELPFUL INFORMATION RESOURCE

The Defense Contract Management Agency **fraud website** (CAC access required) is an excellent resource for the fraud fighting professional.

https://home.dcma.mil/DCMAHQ/center_Y/index.cfm

SAF/GCR STAFFING UPDATE

SAF/GCR has a new Paralegal Specialist, who serves as office administrator and paralegal extraordinaire.

Mr. Horace Blankenship, Paralegal Specialist, joined SAF/GCR since our last staffing update published in the Summer of 2009. Horace joined SAF/GCR from the Veterans Administration where he served as Chief Paralegal in charge of records. He served in the Army (which we do not hold against him) as the Chief Paralegal of the National Guard Bureau. He received multiple awards during that time, including for his legal and administrative assistance to victims of Hurricane Katrina. We are delighted to have him on board.

STAFFING CONT'D

Mr. Adam Munitz joined SAF/GCR as a law clerk in May 2010. Adam will be a third year law student at George Mason University School of Law, where he is concentrating on Homeland & National Security Law. Adam graduated from The Elliot School of International Affairs at The George Washington University in 2006. Upon graduating, he worked as a Contracts Administrator for a major U.S. defense contractor (which we do not hold against him, either). Since beginning law school, Adam has interned at the National Nuclear Security Administration Office of General Counsel, and the U.S. Coast Guard Office of Procurement Law.

UPCOMING TRAINING AND EVENTS

Visit us on **Facebook** (*Air Force Debarment*) or follow us on **Twitter** (@AFdebarmentHQ) for the most up-to-date information on upcoming SAF/GCR training and events, and all debarment Administrative Agreements.

The views and opinions of the authors expressed herein do not necessarily state or reflect the official policy or position of the Department of the Air Force, Department of Defense or the United States Government.



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